

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**MAHMOUD KHALIL,**

Petitioner,

**v.**

**WILLIAM JOYCE ET AL.,**

Respondent.

Case No. 25-cv-01963-MEF

**NOTICE OF MOTION FOR PRO  
HAC VICE ADMISSION OF  
MUDASSAR HAYAT TOPPA**

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned, counsel for Petitioner, shall move pursuant to L. Civ. R. 7.1 before the U.S.D.J., United States District Court, District of New Jersey, at the Courthouse located at 50 Walnut Street, Newark, New Jersey 07102 for an Order admitting Mudassar Hayat Toppa, to appear before this Court pro hac vice for the purpose of acting as counsel for Petitioner in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Petitioner shall rely upon the annexed Certification of Mudassar Hayat Toppa.

It is respectfully requested that the Court rule upon this Motion without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

Pursuant to L. Civ. R. 7.1(d)(4), Plaintiff submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this Motion is necessary because the *pro hac vice* admission of Mudassar Hayat Toppa under L. Civ. R. 101.1(c) is a matter within the sound discretion of the Court, and Petitioner has submitted with this Motion Certification of Mudassar Hayat Toppa and Naz Ahmad in support of the admission.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: March 20, 2025

Respectfully Submitted,

/s/Naz Ahmad

Naz Ahmad

CLEAR PROJECT

MAIN STREET LEGAL SERVICES  
INC.

CUNY School of Law 2 Court  
Square

Long Island City, NY 11101

Tel: (718) 340-4630

naz.ahmad@law.cuny.edu

*Counsel for Petitioner*